UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et. al, Plaintiffs,	:	
v.	:	C.A. No.: 03-335-L
JEFFREY DERDERIAN, et. al Defendants.	:	

CLEAR CHANNEL DEFENDANTS' MOTION TO EXCEED PAGE LIMITS FOR THE FILING OF A MOTION TO DISMISS

Those Clear Channel defendants who have been properly served ("Defendants") hereby move this Court for an order allowing it to exceed the twenty (20) page limit for memoranda with respect to the filing of a dispositive motion in response to the several complaints. In support of this motion, Defendants respectfully submits the accompanying memorandum.

CLEAR CHANNEL DEFENDANTS,

By their Attorneys,

William P. Robinson III (#1686)
Stephen M. Prignano (#3649)
Stephen J. MacGillivray (#5416)
EDWARDS & ANGELL, LLP
2800 Financial Plaza
Providence, RI 02903
(401) 274-9200
(401) 276-6611

W. Thomas McGough, Jr.
James J. Restivo, Jr.
Reed Smith LLP
435 Sixth Avenue
Pittsburgh, PA 15219
(412) 288-3088
Telecopy: (412) 288-3063

Andrew J. Trevelise
Reed Smith LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103
(215) 851-8250
Telecopy: (215) 851-1420
Pro Hac Vice on behalf of Defendant
Clear Channel Broadcasting, Inc.

110

CERTIFICATION

I, the undersigned, hereby certify that on the 25th day of August, 2004 I caused a copy of the within Motion to be mailed by first class mail, postage prepaid, to the following counsel of record:

Brian R. Cunha, Esq.
Karen A. Alegria, Esq.
Brian Cunha & Assoc.
904 Broadway
East Providence, RI 02914

Lauren D. Wilkins, Esq.
Ronald P. Langlois, Esq.
Smith & Brink, P.C.
One State Street
Suite 400
Providence, RI 02908

Mark T. Reynolds, Esq.
Boyer, Reynolds & DeMarco, Ltd.
170 Westminster Street, Suite 200
Providence, RI 02903

Randall L. Souza, Esq.
Nixon Peabody LLP
One Citizens Plaza
Providence, RI 02903

Edward T. Hinchey, Esq.
Curtis R. Diedrich, Esq.
Sloane & Walsh, LLP
Three Center Plaza
Boston, MA 02108

Ronald J. Resmini, Esq.
155 South Main Street
Providence, RI 02903

Ronald J. Creamer, Esq.
155 South Main Street, Suite 400
Providence, RI 02903

Robert I. Reardon, Jr., Esq.
Robert I. Rimmer, Esq.
The Reardon Law Firm, P.C.
160 Hempstead Street
New London, CT 06320

Ralph J. Monaco, Esq.
Conway & Londregan
38 Huntington Street
P.O. Box 1351
New London, CT 06320

Daniel J. Horgan, Esq.
Horgan Law Offices
Five Shaw's Cove, Suite 200
New London, CT 06320

Michael T. Ryan, Esq.
Ryan, Ryan, Johnson & Deluca
80 Fourth Street
P.O. Box 3057
Stamford, CT 06905

James T. Murphy, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Edwin F. McPherson, Esq.
McPherson & Kalmansohn
1801 Century Park East, 24th Floor
Los Angeles, CA 90067

David B. Zabel, Esq.
Cohen & Wolf, PC
1115 Broad Street
P.O. Box 1821
Bridgeport, CT 06604

Benjamin V. White, III, Esq.
Vetter & White, Inc.
20 Washington Place
Providence, RI 02903

Carla Ottaviano, Esq.
Law Office of George J. DuBorg
200 Glastonbury Boulevard, Suite 301
Glastonbury, CT 06033

Matthew F. Medeiros, Esq.
Little, Bulman, Medeiros & Whitney, P.C.
72 Pine Street, 5th Floor
Providence, RI 02903

Edward B. O'Connell, Jr., Esq.
Waller, Smith & Palmer, P.C.
51 Eugene O'Neill Drive
P.O. Box 88
New London, CT 06320

Bruce P. Keller, Esq.
Debevoise & Plimpton
919 Third Avenue
New York, NY 10022

Faith A. LaSalle, Esq.
Law Offices of Faith LaSalle
One Turks Head Place
76 Westminster Street, Suite 1010
Providence, RI 02903

Jose M. Rojas, Esq.
Shipman & Goodwin
One American Row
Hartford, CT 06103-2819

Allan B. Taylor, Esq.
Day, Berry & Howard
185 Asylum Street
City Place I
Hartford, CT 06103

Marc DeSisto, Esq.
DeSisto Law
211 Angell Street
P.O. Box 2563
Providence, RI 02906-2563

Joseph V. Cavanagh, Jr., Esq.
Kristin E. Rodgers, Esq.
Blish & Cavanagh
30 Exchange Terrace
Providence, RI 02903

Edward M. Crane, Esq.
Deborah G. Solmor, Esq.
Skadden, Arps, Slate, Meagher & Flom
333 West Wacker Drive, Suite 2100
Chicago, IL 60606

Howard A. Merten, Esq.
Vetter & White, Incorporated
20 Washington Place
Providence, RI 02903

Thomas C. Angelone, Esq.
Hodosh, Spinella & Angelone
One Turks Head Place, Suite 1050
Providence, RI 02903

Thomas R. Bender, Esq.
James T. Murphy, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Scott J. Tucker, Esq.
Tucker, Heifetz & Saltzman
Three School Street
Boston, MA 02108

Donald J. Maroney, Esq.
146 Westminster Street, Suite 500
Providence, RI 02903

James H. Reilly, Esq.
Kelly, Kelleher, Reilly & Simpson
146 Westminster Street
Providence, RI 02903

James R. Lee, Esq.
Attorney General's Office
150 South Main Street
Providence, RI 02903

James T. Murphy, Esq.
Kelly N. Michels, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Scott J. Tucker, Esq.
Tucker, Heifetz & Saltzman
Three School Street
Boston, MA 02108

Gerald C. DeMaria, Esq.
Higgins, Cavanagh & Cooney
123 Dyer Street
Providence, RI 02903

John R. Crockett, Esq.
Susan S. Wettle, Esq.
Carl A. Henlein, Esq.
Frost Brown Todd LLC
400 West Market Street, 32nd floor
Louisville, KY 40202-3363

Mark T. Nugent, Esq.
Paul V. Sullivan, Esq.
Morrison, Mahoney & Miller
One Providence Washington Plaza
Providence, RI 02903

Stefanie DiMaio Larivee, Esq.
215 Broadway
Providence, RI 02903

Daniel P. McKiernan, Esq.
146 Westminster Street
Providence, RI 02903

Ann S. Sheeley, Esq.
Stephen Born, Esq.
Law Offices of Donald E. Green, P.C.
2235 Washington Street
Roxbury, MA 02119

Stephen E. Breggia, Esq.
Breggia, Bowen & Grande
395 Smith Street
Providence, RI 02908

William A. Filippo, Esq.
Steven A. Minicucci, Esq.
373 Elmwood Avenue
Providence, RI 02907

Scott Hubbell, Esq.
Summers Law Office
P.O. Box 306
Franklin, MA 02038-0306

Mark S. Mandell, Esq.
One Park Row
Providence, RI 02903

Charles N. Redihan, Jr., Esq.
Kiernan, Plunkett & Redihan
91 Friendship Street
Providence, RI 02903

Michael A. St. Pierre, Esq.
Revens, Revens & St. Pierre, P.C.
946 Centerville Road
Warwick, RI 02886

Joyce A. Faraone, Esq.
400 Reservoir Avenue, Suite 3G
Providence, RI 02907

James Howe, Esq.
215 Broadway
Providence, RI 02903

Eva Mancuso, Esq.
Hamel, Waxler, Allen & Collins
387 Atwells Avenue
Providence, RI 02909

Donald A. Migliori, Esq.
Ness, Motley, Loadholt, Richardson & Poole
321 South Main Street, Suite 402
Providence, RI 02903

Oleg Nikolyszyn, Esq.
155 South Main Street, Suite 303
Providence, RI 02903

Christopher L. Russo, Esq.
888 Reservoir Avenue
Cranston, RI 02910

Mark D. Tourgee, Esq.
Timothy A. Williamson, Esq.
Inman & Tourgee
1193 Tiogue Avenue
Coventry, RI 02816

Max Wistow, Esq.
Wistow & Barylick
61 Weybosset Street
Providence, RI 02903

Patrick T. Jones, Esq.
Cooley Manion Jones, LLP
21 Custom House Street
Boston, MA 02110

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et. al, Plaintiffs,	:	
v.	:	C.A. No.: 03-335-L
JEFFREY DERDERIAN, et. al Defendants.	:	

MEMORANDUM IN SUPPORT OF CLEAR CHANNEL DEFENDANTS' MOTION TO EXCEED PAGE LIMITS FOR THE FILING OF A MOTION TO DISMISS

Those Clear Channel defendants who have been properly served ("Defendants") hereby moves this Court for an order allowing it to exceed the twenty (20) page limit for memoranda with respect to the filing of a dispositive motion in response to the several complaints.

Defendants are named in the above-captioned lawsuit currently pending before this Court, which is related to the fire that occurred at the Station Nightclub in February 2003. In order to conserve the resources of the parties and the Court, these Defendants are prepared to file a single, identical memorandum supporting a motion to dismiss in each of the seven cases now pending before this Court that relate to that fire.[1] The memorandum filed by the Defendants will address numerous legal issues, and must consider all of the claims pending against it in each case. Because the memorandum will address all seven suits, the actual number of pages to be considered by this Court would be considerably less than would be permitted if the Defendants filed seven distinct and separate twenty-page memoranda.

---

[1] In the alternative, if the Court permits, a single omnibus memorandum that would apply to all seven cases will be filed.

Because of the complexity of the legal issues presented in the cases, the number of claims, and the desire to file a comprehensive memorandum, Defendants hereby request that they be allowed to file a memorandum in excess of the twenty (20) page limit.

CLEAR CHANNEL DEFENDANTS,

By their Attorneys,

William P. Robinson III (#1686)
Stephen M. Prignano (#3649)
Stephen J. MacGillivray (#5416)
EDWARDS & ANGELL, LLP
2800 Financial Plaza
Providence, RI 02903
(401) 274-9200
(401) 276-6611

W. Thomas McGough, Jr.
James J. Restivo, Jr.
Reed Smith LLP
435 Sixth Avenue
Pittsburgh, PA 15219
(412) 288-3088
Telecopy: (412) 288-3063

Andrew J. Trevelise
Reed Smith LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103
(215) 851-8250
Telecopy: (215) 851-1420
Pro Hac Vice on behalf of Defendant
Clear Channel Broadcasting, Inc.

CERTIFICATION

I, the undersigned, hereby certify that on the 25th day of August, 2004 I caused a copy of the within Memorandum to be mailed by first class mail, postage prepaid, to the following counsel of record:

Brian R. Cunha, Esq.
Karen A. Alegria, Esq.
Brian Cunha & Assoc.
904 Broadway
East Providence, RI 02914

Lauren D. Wilkins, Esq.
Ronald P. Langlois, Esq.
Smith & Brink, P.C.
One State Street
Suite 400
Providence, RI 02908

Mark T. Reynolds, Esq.
Boyer, Reynolds & DeMarco, Ltd.
170 Westminster Street, Suite 200
Providence, RI 02903

Randall L. Souza, Esq.
Nixon Peabody LLP
One Citizens Plaza
Providence, RI 02903

Edward T. Hinchey, Esq.
Curtis R. Diedrich, Esq.
Sloane & Walsh, LLP
Three Center Plaza
Boston, MA 02108

Ronald J. Resmini, Esq.
155 South Main Street
Providence, RI 02903

Ronald J. Creamer, Esq.
155 South Main Street, Suite 400
Providence, RI 02903

Robert I. Reardon, Jr., Esq.
Robert I. Rimmer, Esq.
The Reardon Law Firm, P.C.
160 Hempstead Street
New London, CT 06320

Ralph J. Monaco, Esq.
Conway & Londregan
38 Huntington Street
P.O. Box 1351
New London, CT 06320

Daniel J. Horgan, Esq.
Horgan Law Offices
Five Shaw's Cove, Suite 200
New London, CT 06320

Michael T. Ryan, Esq.
Ryan, Ryan, Johnson & Deluca
80 Fourth Street
P.O. Box 3057
Stamford, CT 06905

James T. Murphy, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Edwin F. McPherson, Esq.
McPherson & Kalmansohn
1801 Century Park East, 24th Floor
Los Angeles, CA 90067

David B. Zabel, Esq.
Cohen & Wolf, PC
1115 Broad Street
P.O. Box 1821
Bridgeport, CT 06604

Benjamin V. White, III, Esq.
Vetter & White, Inc.
20 Washington Place
Providence, RI 02903

Carla Ottaviano, Esq.
Law Office of George J. DuBorg
200 Glastonbury Boulevard, Suite 301
Glastonbury, CT 06033

Matthew F. Medeiros, Esq.
Little, Bulman, Medeiros & Whitney, P.C.
72 Pine Street, 5th Floor
Providence, RI 02903

Edward B. O'Connell, Jr., Esq.
Waller, Smith & Palmer, P.C.
51 Eugene O'Neill Drive
P.O. Box 88
New London, CT 06320

Bruce P. Keller, Esq.
Debevoise & Plimpton
919 Third Avenue
New York, NY 10022

Faith A. LaSalle, Esq.
Law Offices of Faith LaSalle
One Turks Head Place
76 Westminster Street, Suite 1010
Providence, RI 02903

Jose M. Rojas, Esq.
Shipman & Goodwin
One American Row
Hartford, CT 06103-2819

Allan B. Taylor, Esq.
Day, Berry & Howard
185 Asylum Street
City Place I
Hartford, CT 06103

Marc DeSisto, Esq.
DeSisto Law
211 Angell Street
P.O. Box 2563
Providence, RI 02906-2563

Joseph V. Cavanagh, Jr., Esq.
Kristin E. Rodgers, Esq.
Blish & Cavanagh
30 Exchange Terrace
Providence, RI 02903

Edward M. Crane, Esq.
Deborah G. Solmor, Esq.
Skadden, Arps, Slate, Meagher & Flom
333 West Wacker Drive, Suite 2100
Chicago, IL 60606

Howard A. Merten, Esq.
Vetter & White, Incorporated
20 Washington Place
Providence, RI 02903

Thomas C. Angelone, Esq.
Hodosh, Spinella & Angelone
One Turks Head Place, Suite 1050
Providence, RI 02903

Thomas R. Bender, Esq.
James T. Murphy, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Scott J. Tucker, Esq.
Tucker, Heifetz & Saltzman
Three School Street
Boston, MA 02108

Donald J. Maroney, Esq.
146 Westminster Street, Suite 500
Providence, RI 02903

James H. Reilly, Esq.
Kelly, Kelleher, Reilly & Simpson
146 Westminster Street
Providence, RI 02903

James R. Lee, Esq.
Attorney General's Office
150 South Main Street
Providence, RI 02903

James T. Murphy, Esq.
Kelly N. Michels, Esq.
Hanson Curran LLP
146 Westminster Street
Providence, RI 02903-2218

Scott J. Tucker, Esq.
Tucker, Heifetz & Saltzman
Three School Street
Boston, MA 02108

Gerald C. DeMaria, Esq.
Higgins, Cavanagh & Cooney
123 Dyer Street
Providence, RI 02903

John R. Crockett, Esq.
Susan S. Wettle, Esq.
Carl A. Henlein, Esq.
Frost Brown Todd LLC
400 West Market Street, 32nd floor
Louisville, KY 40202-3363

Mark T. Nugent, Esq.
Paul V. Sullivan, Esq.
Morrison, Mahoney & Miller
One Providence Washington Plaza
Providence, RI 02903

Stefanie DiMaio Larivee, Esq.
215 Broadway
Providence, RI 02903

Daniel P. McKiernan, Esq.
146 Westminster Street
Providence, RI 02903

Ann S. Sheeley, Esq.
Stephen Born, Esq.
Law Offices of Donald E. Green, P.C.
2235 Washington Street
Roxbury, MA 02119

Stephen E. Breggia, Esq.
Breggia, Bowen & Grande
395 Smith Street
Providence, RI 02908

William A. Filippo, Esq.
Steven A. Minicucci, Esq.
373 Elmwood Avenue
Providence, RI 02907

Scott Hubbell, Esq.
Summers Law Office
P.O. Box 306
Franklin, MA 02038-0306

Mark S. Mandell, Esq.
One Park Row
Providence, RI 02903

Charles N. Redihan, Jr., Esq.
Kiernan, Plunkett & Redihan
91 Friendship Street
Providence, RI 02903

Michael A. St. Pierre, Esq.
Revens, Revens & St. Pierre, P.C.
946 Centerville Road
Warwick, RI 02886

Joyce A. Faraone, Esq.
400 Reservoir Avenue, Suite 3G
Providence, RI 02907

James Howe, Esq.
215 Broadway
Providence, RI 02903

Eva Mancuso, Esq.
Hamel, Waxler, Allen & Collins
387 Atwells Avenue
Providence, RI 02909

Donald A. Migliori, Esq.
Ness, Motley, Loadholt, Richardson & Poole
321 South Main Street, Suite 402
Providence, RI 02903

Oleg Nikolyszyn, Esq.
155 South Main Street, Suite 303
Providence, RI 02903

Christopher L. Russo, Esq.
888 Reservoir Avenue
Cranston, RI 02910

Mark D. Tourgee, Esq.
Timothy A. Williamson, Esq.
Inman & Tourgee
1193 Tiogue Avenue
Coventry, RI 02816

Max Wistow, Esq.
Wistow & Barylick
61 Weybosset Street
Providence, RI 02903

Patrick T. Jones, Esq.
Cooley Manion Jones, LLP
21 Custom House Street
Boston, MA 02110